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OWEN DIAZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

OWEN DIAZ,
Plaintiff,
v.
TESLA, INC. dba TESLA MOTORS, INC.;
Defendant.

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Case No. 3:17-cv-06748-WHO

**DECLARATION OF CIMONE NUNLEY
ISO PLAINTIFF'S PROFFER OF
TESTIMONY OF OWEN DIAZ RE:
SCOPE OF ANTICIPATED
TESTIMONY OF MICHAEL WHEELER**

Trial Date: March 27, 2023
Complaint filed: October 16, 2017

1 I, CIMONE A. NUNLEY, hereby declare:

2 1. I am an attorney licensed to practice law in the State of California. I am an
3 attorney with the law firm of California Civil Rights Law Group, attorneys of record for
4 Plaintiffs Demetric Di-Az and Owen Diaz in this action. I submit this Declaration in support of
5 Plaintiffs' Motion for Sanctions. I have personal knowledge of the facts stated herein and if
6 called upon to testify, I could and would competently testify thereto, except as to those matters
7 that are stated upon information and belief.
8

9 2. Attached hereto as **Exhibit A** are true and correct copies of various excerpts from
10 Volume 3 of the trial transcript in this matter.
11

12 3. Attached hereto as **Exhibit B** are true and correct copies of various excerpts from
13 the deposition of Michael John Wheeler in this matter.

14 I declare under penalty of perjury under the laws of the United States of America that the
15 foregoing is true and correct. Executed on March 3, 2023 in Sacramento, California.
16

17 CALIFORNIA CIVIL RIGHTS LAW GROUP
18 ALEXANDER MORRISON + FEHR LLP
19 ALTSHULER BERZON LLP
20 COLLIER LAW FIRM, LLP

21 DATED: March 3, 2023



22 Attorney for Plaintiff OWEN DIAZ
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